

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NESSA RISLEY, individually and on behalf of	:	
all others similarly situated,	:	
	:	
Plaintiff,	:	
	:	
v.	:	1:22-cv-02780-KPF
	:	
UNIVERSAL NAVIGATION INC. d/b/a	:	
UNISWAP LABS, HAYDEN Z. ADAMS,	:	
PARADIGM OPERATIONS LP, AH CAPITAL	:	
MANAGEMENT, L.L.C. d/b/a ANDREESSEN	:	
HOROWITZ, and UNION SQUARE	:	
VENTURES, LLC,	:	
	:	
Defendants.	:	
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**STIPULATION AND ORDER SETTING DEADLINES FOR FILING OF  
AMENDED COMPLAINT AND DEFENDANTS' RESPONSE**

WHEREAS, on April 4, 2022, Nessa Risley ("Plaintiff"), individually and on behalf of all others similarly situated, filed a class action complaint against Universal Navigation Inc. d/b/a Uniswap Labs, Hayden Z. Adams, Paradigm Operations LP, AH Capital Management, L.L.C. d/b/a Andreessen Horowitz, and Union Square Ventures, LLC (collectively, "Defendants") in the above-captioned case alleging violations of the Securities Act of 1933 and the Securities Exchange Act of 1934;

WHEREAS, the action is subject to the Private Securities Litigation Reform Act of 1995 (the "PSLRA");

WHEREAS, the Court previously ordered the parties to confer and submit a proposed schedule for the filing of a consolidated or amended complaint and Defendants' response thereto

within 15 days after a lead plaintiff has been appointed and lead counsel approved by the Court in accordance with the PSLRA (Dkt. No. 21);

WHEREAS, the Court entered an Order Appointing Lead Plaintiffs and Approving Selection of Co-Lead Counsel on July 29, 2022 (Dkt. No. 40);

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by counsel for the parties listed below, that:

1. Plaintiff shall file an amended complaint on or before **September 26, 2022**.
2. Defendants shall move or otherwise respond to the amended complaint on or before **October 26, 2022**.
3. To the extent any Defendant files a pre-motion letter in accordance with Rule 4.A of the Court's Individual Rules of Practice, any responsive correspondence from Lead Plaintiffs shall be filed on or before **October 31, 2022**.
4. By entering into this stipulation, Defendants do not waive any defenses that otherwise could be asserted through a motion pursuant to Fed. R. Civ. P. 12 or otherwise.

Dated: New York, New York  
August 15, 2022

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*Attorneys for Lead Plaintiffs*

Dated: New York, New York  
August 15, 2022

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*Attorneys for Defendants Universal Navigation, Inc.,  
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Dated: New York, New York  
August 15, 2022

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*Attorneys for Defendant AH Capital Management, L.L.C.*

Dated: New York, New York  
August 15, 2022

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*Attorneys for Defendant Paradigm Operations LP*

SO ORDERED this 16th day of August, 2022.



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THE HONORABLE KATHERINE POLK FAILLA  
United States District Judge